

1 BRUCE L. SIMON (Bar No. 96241)
 2 bsimon@pswlaw.com
 3 BENJAMIN E. SHIFTAN (Bar No. 265767)
 4 bshiftan@pswlaw.com
 5 **PEARSON, SIMON & WARSHAW, LLP**
 44 Montgomery Street, Suite 2450
 6 San Francisco, California 94104
 Telephone: (415) 433-9000
 7 Facsimile: (415) 433-9008
 8 CHRISTOPHER B. DOLAN (Bar No. 165358)
 9 chris@cbdllaw.com
THE DOLAN LAW FIRM
 10 1438 Market Street
 11 San Francisco, California 94102
 Telephone: (415) 421-2800
 12 Facsimile: (415) 421-2830

IRELL & MANELLA LLP
 Andra Barmash Greene (123931)
 agreene@irell.com
 A. Matthew Ashley (198235)
 mashley@irell.com
 840 Newport Center Drive, Suite 400
 Newport Beach, California 92660
 Telephone: (949) 760-0991
 Facsimile: (949) 760-5200

Attorneys for Defendants

10 Attorneys for Plaintiffs

11 **UNITED STATES DISTRICT COURT**

12 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

13 L.A. Taxi Cooperative, Inc. dba Yellow Cab
 14 Co.; Administrative Services SD, LLC dba
 15 Yellow Radio Service; All Yellow Taxi, Inc.
 dba Metro Cab; American Cab, LLC;
 16 American Cab, LLC dba Pomona Valley
 Yellow Cab; Bell Cab Company, Inc.; Big
 17 Dog City Corporation dba Citywide Dispatch,
 Citywide Taxi, and Big Dog Cab; Cabco
 18 Yellow, Inc. dba California Yellow Cab; C&J
 Leasing, Inc. dba Royal Taxi; G&S Transit
 19 Management, Inc.; Gorgee Enterprises, Inc.;
 LA City Cab, LLC; Long Beach Yellow Cab
 20 Co-operative, Inc.; Network Paratransit
 Systems, Inc.; South Bay Co-operative, Inc.
 21 dba United Checker Cab; Taxi Leasing, Inc.
 dba Yellow Cab of Ventura County; Tri-City
 22 Transportation Systems, Inc.; Tri Counties
 Transit Corporation dba Blue Dolphin Cab of
 Santa Barbara, Yellow Cab of Santa Maria,
 and Yellow Cab of San Luis Obispo; and
 23 Yellow Cab of South Bay Co-operative, Inc.
 dba South Bay Yellow Cab,

24 Plaintiffs,

25 vs.

26 Uber Technologies, Inc.; Rasier, LLC; and
 27 Rasier-CA, LLC,

28 Defendants.

CASE NO. 3:15-cv-01257-JST

**JOINT CASE MANAGEMENT
SCHEDULE**

[If the Court Deems Necessary]

Date: August 5, 2015

Time: 10:00 a.m.

Crtrm.: 9, 19th Floor (Telephone Conference)

PEARSON, SIMON & WARSHAW, LLP
 44 MONTGOMERY STREET, SUITE 2450
 SAN FRANCISCO, CALIFORNIA 94104

Pursuant to the Court's directive at the July 22, 2015 Case Management Conference, Plaintiffs¹ and Uber² have met and conferred in an effort to create a case management schedule. This proposed case management schedule is without prejudice to the parties' rights to seek to modify the schedule.

Event	Proposed Date
Initial Disclosures	Parties have already exchanged
Plaintiffs to File First Amended Complaint Pursuant to Court's Ruling on Motion to Dismiss (ECF No. 44)	August 3, 2015
Defendants to Respond to First Amended Complaint	August 24, 2015
Amendment of the Pleadings Deadline	October 16, 2015, with both Plaintiffs and Uber reserving the right to seek leave to amend as investigation and discovery develops
Further Case Management Conference	December 9, 2015
Discovery Cut-off for Non-Expert Discovery	August 10, 2016

¹ "Plaintiffs" signifies all taxi cab companies named as Plaintiffs in the Complaint.

² "Uber" or "Defendants" signifies all three defendants: Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC.

Designation and Opening Reports of Experts	August 12, 2016
Rebuttal Expert Designation and Reports	September 23, 2016
Discovery Cut-off for Expert Discovery	October 14, 2016
Mediation Deadline	October 14, 2016
Dispositive Motions Filing	October 21, 2016
Oppositions to Dispositive Motions	November 11, 2016
Replies in Support of Dispositive Motions	November 23, 2016
Hearing of Dispositive Motions	December 8, 2016
Pre-trial Conference	December 16, 2016
Trial	January 17, 2017

Plaintiffs and Uber offer this proposed schedule based upon information available to them pursuant to the investigation that they have been able to conduct to date. While Plaintiffs and Uber have investigated sources of information immediately available to them, Plaintiffs and Uber have not yet had sufficient opportunity to interview all persons who have, or may have, knowledge of the facts relevant to this lawsuit or review all documents which refer or relate to such facts. As discovery in this lawsuit continues, additional information, persons, and documents may become known to Plaintiffs and their counsel. The knowledge of this additional information, these persons, and these documents may require a change in the schedule.

The parties have also discussed various discovery issues, and have agreed to the following:

Interrogatories:

At this early stage in the case, the parties have agreed that Rule 33(a) of the Federal Rules

1 of Civil Procedure be modified to allow Plaintiffs to collectively serve 35 interrogatories on
 2 Defendants, and Defendants to collectively serve 35 interrogatories on Plaintiffs. Any
 3 interrogatory will count as a single interrogatory, regardless of the number of parties to whom the
 4 interrogatory is directed and regardless of the number of parties serving the interrogatory.
 5 Moreover, any interrogatory will be deemed a single interrogatory even where the response to that
 6 interrogatory differs for each propounding party, or where the interrogatory contains reasonable
 7 subparts, the responses to which may only be of interest to certain of the propounding parties. The
 8 parties agree to meet and confer in good faith in the future about an alternative arrangement if this
 9 approach does not prove workable. The parties reserve all rights to seek judicial intervention if
 10 necessary.

11 Depositions:

12 At this early stage in the case, the parties have agreed that depositions of named parties
 13 under Federal Rule of Civil Procedure 30(b)(6) do not count towards each side's 10-deposition-
 14 per-side limit under Federal Rule of Civil Procedure Rule 30. The parties agree to meet and
 15 confer in good faith in the future about an alternative arrangement if this approach does not prove
 16 workable. The parties reserve all rights to seek judicial intervention if necessary.

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1 DATED: July 31, 2015

/s/ Benjamin E. Shiftan

BRUCE L. SIMON (Bar No. 96241)

bsimon@pswlaw.com

BENJAMIN E. SHIFTAN (Bar No. 265767)

bshiftan@pswlaw.com

PEARSON, SIMON & WARSHAW, LLP

44 Montgomery Street, Suite 2450

San Francisco, California 94104

Telephone: (415) 433-9000

Facsimile: (415) 433-9008

CHRISTOPHER B. DOLAN (Bar No. 165358)

chris@cbdlaw.com

THE DOLAN LAW FIRM

1438 Market Street

San Francisco, California 94102

Telephone: (415) 421-2800

Facsimile: (415) 421-2830

Attorneys for Plaintiffs

/s/ A. Matthew Ashley

A. MATTHEW ASHLEY (Bar No. 198235)

mashley@irell.com

ANDRA BARMASH GREENE (Bar No. 123931)

agreene@irell.com

IRELL & MANELLA, LLP

840 Newport Center Drive, Suite 400

Newport Beach, California 92660

Telephone: (949) 760-0991

Facsimile: (949) 760-5200

Attorneys for Defendants

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20 *Filer's Attestation: Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, Benjamin E.*
21 *Shiftan hereby attests that concurrence in the filing of this document has been obtained by all*
22 *signatories.*